

EXHIBIT 2

Exhibit 2

Plan Funding Projections

Assumptions

Monthly Disposable Income

The monthly disposable estimated income is predicated upon the Debtor receiving an annual draw of approximately \$156,000 per year. The Debtor has received monthly draws ranging from \$13,000 to \$15,000 since MMS Advisors' founding in 2002.

AmTrust Whistleblower Award

The SEC announced on June 17, 2020 that it had reached a settlement with AmTrust for \$10.5 million related to the whistleblower tips and substantial assistance provided by the Debtor's Whistleblower Team. [SEC.gov | Insurance Company and Former CFO Charged With Faulty Loss Reserves Disclosures](#). The SEC uses a rating system to determine the percentage award to be received by whistleblowers. As noted in the AmTrust SEC Whistleblower Award application, which was filed in October 2020, the AmTrust Whistleblower Team qualifies for a 30% award. The team was the original source of information that was the basis of the SEC's complaint against AmTrust and provided extraordinary levels of support to the SEC and the Department of Justice on this case. Based upon an agreement with the Whistleblower Team, the Debtor is entitled to a 22% share of the whistleblower award proceeds. That would equate to an award of \$693,000. For the purposes of the projection, the Debtor has assumed that the award will be \$550,000. The Debtor anticipates that the award payment will occur in two years.

Life Partners Whistleblower Proceeds

The projection reflects the two most likely outcomes for the Debtor's recovery from the Life Partners award. The SEC's preliminary letter of determination noted the Debtor will be receiving an award of 23%. The Debtor's attorneys are entitled to 12.5% of the first two million of award payments and 15.0% of next award payments from \$3 million to \$10 million. The low estimate of the projection, \$15,946, is based upon the SEC indicated \$18,224 award, less \$2,278 of attorney's fees. The high estimate of the projection, \$7,343,325, is based upon 23% of the SEC's \$38,700,00 judgment against Life Partners, less \$1,285,150 of attorney's fees. The timing in the projection represents the expected period for the Debtor's attorneys appeal the award, which would be pursued if the formal contest with the SEC of the preliminary determination is not successful.

Estimated Share of MMS Sale of Forensic Accounting Research

It typically takes approximately a year for MMS to prepare a research report based upon a forensic investigation of publicly available information of a suspected accounting fraud. The projections assume a success rate of 50% and, therefore, show payments to the Debtor from MMS Advisors for this research occurring every other year. MMS Advisors expects to complete its current research report later this year. Thus far, the MMS Advisors' team has dedicated approximately 3,500 hours to this effort, which, at \$250 per hour, represents an investment of \$875,000 of professional fees.

MMS has a pipeline of similar cases and has a formalized process to evaluate these opportunities. There is an initial “proof of concept” research effort to confirm the existence of the suspected accounting fraud. Two other cases have passed the “proof of concept” review, one of which required approximately 500 hours of initial research and the other approximately 300 hours of initial research. MMS Advisors has other cases that are in earlier stages of research and can be selective in the cases that it pursues.

The Debtor’s share of the research proceeds is expected to be 33%, with 33% being paid to his partner, and the remaining 34% being used to pay other professionals assisting with the research and to fund overhead costs. The initial sale of MMS research generated \$1.8 million in revenue. The Debtor’s projected share of future research proceeds of \$250,000 to \$750,000 every other year equates to MMS Advisors receiving research proceeds ranging from \$750,000 to \$2,25 million.

Camac Litigation Funding

The projection’s two scenarios reflect a scenario where Camac does not release the \$689,171 held in an IOLTA account or that the funds are fully released. The timing of the release of the funds is assumed to occur in two years.

Description	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Monthly Disposable Income	16,560	16,560	16,560	16,560	16,560	82,800
AmTrust Whistleblower Proceeds	-	550,000	-	-	-	550,000
Estimated Life Partners Whistleblower Proceeds	-	-	15,946	-	-	15,946
Low Estimate	-	-	7,615,850	-	-	7,615,850
High Estimate	-	-	-	-	-	-
Estimated Share of MMS Sale of Forensic Accounting Research	250,000	-	250,000	-	250,000	750,000
Low Estimate	250,000	-	750,000	-	750,000	2,250,000
High Estimate	750,000	-	-	-	-	-
Camac Litigation Funding	-	-	-	-	-	-
Low Estimate	-	-	-	-	-	-
High Estimate	-	689,171	-	-	-	689,171
Total	266,560	566,560	282,506	16,560	266,560	1,398,746
Low Estimate	266,560	1,255,731	8,382,410	16,560	766,560	11,187,821
High Estimate	-	-	-	-	-	-